

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: Khalilah Raqaiyah Hunter

§ CASE NO. 24-32553-H3-13

Debtor(s)

§  
§  
§  
§ Chapter 13

DEBTOR'S OBJECTION TO PROOF OF CLAIM  
OF GREENSPPOINT LANDING CONDO ASSOC, INC. CLAIM NO. 16

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE. YOU SHOULD IMMEDIATELY CONTACT THE OBJECTING PARTY TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU SHOULD FILE YOUR RESPONSE TO THE OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE OBJECTING PARTY WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED. A HEARING ON THIS MATTER WILL BE HELD ON NOVEMBER 6, 2024 AT 9:00AM. VIDEO PARTICIPATION IS AVAILABLE AT <https://gotomeet.me/judgerodriguez> AUDIO PARTICIPATION IS ALSO REQUIRED. For audio, dial 832-917-1510, Conference Code 999276.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

**Khalilah Raqaiyah Hunter**, (“Debtor”) objects to the proof of claim identified below.

1. Creditor: Greenspoint Landing Condo Assoc, Inc. (“Claimant”)
2. Date of Proof of Claim: August 12, 2024 (“Claim”)
3. Claim Number: 16
4. Amount of Proof of Claim: \$3,699.54
5. Scheduled Collateral or Security for Claim (if any): Homestead (as stated in the proof of claim)
6. The basis for the objection by Debtor is as follows:
  - a. Creditor is collecting Penalty & Interest on a zero balance for the month of 2/2023 on 2/26/2023 in the amount of \$4.02 for penalty and interest and \$5.00 late fee; for the month of

9/2023 on 9/21/2023 in the amount of \$202.95 for legal fees for collections on a zero balance and on 09/26/2023 in the amount of \$3.95 for penalty and interest on a zero balance and;

b. Incorrect account balance reflected on the attached pay history.

**WHEREFORE**, Debtor **Khalilah Raqaiyah Hunter** requests the court to consider the objection to the proof of claim and to grant the order attached to this motion. Debtor prays for such other relief both general and special at law and in equity, which they are entitled to receive.

Dated: September 16, 2024

Respectfully submitted,

*/s/ Daniel J Ciment*  
Daniel J Ciment TBN: 24042581  
221 Bella Katy Drive  
Katy, TX 77494  
Phone: 346-307-9343  
Fax : 832-645-5165  
Attorneys for Debtor(s)

#### CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the foregoing was served on the following parties, and on the attached list, if any, by first-class mail or by electronic service via the Court's ECF filing system on September 16, 2024.

US Trustee via Electronic Service  
US Trustee  
Office of the U.S. Trustee  
515 Rusk Avenue, Suite 3516  
Houston, TX 77002

Trustee via Electronic Service  
David G. Peake  
Chapter 13 Trustee  
9660 Hillcroft, Suite 430  
Houston, TX 77096

Debtor via First-Class Mail  
Khalilah Raqaiyah Hunter  
17210 Imperial Valley Dr. #49  
Houston, Texas 77060

Creditor via Electronic Service  
Greenspoint Landing Condo Assoc, Inc.  
c/o Holt Tollett, PC  
9821 Katy Freeway, Suite 350  
Houston, Texas 77024

*/s/ Daniel J. Ciment*  
Daniel J. Ciment